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Citizens Telephone COOP EHS Manual

SAFETY, HEALTH AND ENVIRONMENTAL PROGRAM MANUAL

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1.0 OBJECTIVE

Program Implementation includes the necessary commitments from management and ownership that set the course and direction of the overall programs with the objective of providing a clear and uniform vision that is used to drive a culture of responsibility in Safety, Health and Environmental performance. CITIZENS is committed to planning and detailing the necessary administrative requirements to assure a successful program and providing adequate staff and funding to assure follow through on our commitments.

2.0 SCOPE

This company's program manual on Safety, Health, and Environment serves to document policies and procedures to enable us to implement an effective program throughout the organization. This program applies to all CITIZENS employees, contractors, vendors and at all CITIZENS facilities.

The program contained herein have been established to accomplish the following:

- Protect and promote the health and safety of employees, customers and others who may be affected by the company's business activities.
- Comply with all pertinent regulatory and contractual obligations.
- Assure that safety, health, and environmental programs are given the proper priority and attention, and are achieving the required results.
- Coordinate safety, health, and environmental activities while maintaining consistency in procedures at the required level of performance.

These policies and procedures shall be utilized for all CITIZENS facilities, equipment and activities. Failure to follow these procedures shall result in corrective and disciplinary action(s) up to and including termination of employment or contracts.

3.0 POLICY AND IMPLEMENTATION

3.1 Policy

Our employees are our most valuable asset. It is our policy that every person is entitled to a safe and healthful place in which to work.

Establishment and maintenance of a safe environment is the shared responsibility between the employer and employees at all levels of the organization. To this end, every reasonable effort will be made in achieving the goal of incident prevention and health preservation.

Citizen's philosophy is oriented toward affirmative control and minimization of risk to the greatest extent possible. We have a basic responsibility to make the safety of employees a part of our concern. We will be counting on our employees to do their part in making our program an effective one.

The success of the company will depend not only on customer service, but also how safely each job is performed. There is no job so important—nor any service so urgent—that we cannot take time to work safely.

The company will aggressively pursue a plan to minimize pain and suffering of an injured worker, and return him/her to active work duties as soon as possible.

CITIZENS shall place the safety and health of its employees as an equal player in our inventory of sound business practices. Quality, schedule or production will not displace safety and health but be equal values in the successful operation of this company.

We consider the safety of our personnel to be of prime importance, and expect their full cooperation in making our program effective.

3.2 Implementation

Program implementation is built on a commitment from our ownership and management regarding the importance of safety, a clear establishment of vision & policy, a clear chain of command, and the record keeping requirement of maintaining the overall program.

Outlining the chain of command and the proper delineation of roles and responsibilities assures that the message and accountability for performance reaches all levels of the organization. Maintenance of records provides quality assurance and auditable performance measures as well as meeting regulatory requirements.

4.0 VISION and INJURY FREE (IFF) COMMITMENT

At the root of this program is a belief that there are no new ways to get injured in servicing activities. With all the possibilities known it is the challenge of our telecommunications industry to work to find new ways to take what we know and eliminate or mitigate hazards in our workplace, and job sites, engineer and encourage our customers to engineer safety and health into our buildings, works and business, provide the best administrative programs that we can develop and staff and as a last result program and implement Personal Protective Equipment (PPE) for hazards which remain. It is more than a commitment to safety and health it a commitment to creating a self-sustaining and perpetuating Safety Culture and sound business model from our ownership to the service employee which believes our work can be performed Incident and Injury Free.

To this end we are committed to providing the training and indoctrination necessary; to designate a senior safety leadership team to drive this commitment; to provide avenues for employee feedback in a measurable manner traceable to corrective actions, and lastly to arrange and promote celebration of our successes along the way at all levels of the organization.

5.0 ADMINISTRATION and RESPONSIBILITIES (not sure how you want to word these key people)

This program recognizes the following job classifications within the CITIZENS organization, titles commonly required by regulation and other stakeholders. An organizational chart of the CITIZENS organization and list of the job titles/roles in the company has been established and is available upon request.

Following is an assignment of roles and responsibilities for the administration, implementation, monitoring, and control of this program.

Chief Executive Officer

- Exemplify the fundamental principles of this program.
- Overall responsibility for establishment of policy and monitoring effectiveness.
- Review and approve policy and procedure changes.
- Assure avenues for safety feedback are effective and confidential where required.
- Assure appropriate resources are available to implement the requirements of this program.

Safety Leadership Team

- Exemplify the fundamental principles of this program.
- Report recommendations to the Country Director
- Continuously pursue advancement in personal safety and risk management expertise
- Meet on a regular schedule.
- Review all incident reports and determine preventability.
- Participate in job review process.
- Review employee safety suggestions.
- Recommend and assist in establishing additional general safety rules as the need is identified.
- Develop and monitor a safety improvement plan with respect to company activities.

Operations

- Exemplify the fundamental principles of this program.
- Consistently enforce program rules and guidelines through corrective and disciplinary actions
- Overall responsibility for field implementation of program requirements
- Review and approve policy and procedure changes.
- Assure direct feedback from the field on issues through safety suggestions.

Managers

- Exemplify the fundamental principles of this program.
- Report to the ?????????????? on program related matters.
- Consistently enforce program rules and guidelines through disciplinary observation either directly or as delegated to Managers and Supervisors, using Behavior Based Observation Program.
- Actively participate in review and modification of procedures related to policy implementation.
- Ensuring safe work practices at the work facility.
- Ensuring that the proper equipment and PPE is on the work site or facility prior to use.
- Ensuring that all SDS documents are on the work site.
- Has the responsibility and authority to shut down any operation not considered safe until condition is corrected.

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- Hold all tier subcontractors accountable for responsibilities delineated in this program.
- Review and approve facility specific safety procedures.

Managers and Supervisors

- Exemplify the fundamental principles of this program.
- Report to ?????????????? on program related matters.
- Consistently enforce program rules and guidelines through disciplinary observation either directly or as delegated, using the Behavior Based Observation Program.
- Actively participate in review and modification of procedures related to policy implementation.
- Ensuring safe work practices at the work facility.
- Ensuring that the proper equipment and PPE is at the facility prior to use.
- Has the responsibility and authority to shut down any operation not considered safe until condition is corrected.
- Hold all their subcontractors accountable for responsibilities delineated in this program.
- Review and approve facility specific safety procedures.

Safety Managers/Team?

- Exemplify the fundamental principles of this program.
- Provide reports to the Plant Manager on program related matters.
- Be the face and voice of the Behavior Based Observation Program (BBOP).
- Work with Managers and the management organization to interpret and recommend facility specific safety, health and environmental requirements.
- Work hand in hand with activity personnel to solve work problems and balance priorities.
- Has the responsibility and authority to shut down any operation not considered safe until condition is corrected.
- Review, draft and approve facility specific safety procedures.
- Assure all employees receive adequate safety, health and environmental training necessary to implement this program.
- NOTE: The senior safety professional on facility shall be responsible for performing the functions of the Facility Safety Manager, regardless of job classification title.

Person in Charge (PIC)

- On a work site or facility, based on the size, scope and complexity of the job can be the Manager, Supervisor, Foreman, or Lead.
- Exemplify the fundamental principles of this program.
- Report to the Safety Manager on all program related matters.
- Provide feedback on procedures and policies as they affect operations.
- Be knowledgeable on the safety regulation and work practices and take action related to appropriate Competent Person duties
- Ensuring that the proper equipment and PPE is available prior to use.
- Have the responsibility and authority to shut down any operation not considered safe until condition is corrected.
- Hold all their subcontractors accountable for responsibilities delineated in this program.

Company Employees

- All employees shall be active participants in the development and maintenance of this program.

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- All employees shall be responsible to learn and comply with all safety and health rules and regulations applicable to their work. It is their further responsibility to support the company in providing a safe place to work, and to protect themselves and co-workers against injuries or illnesses.
- Employees shall report all safety and health hazards to supervisors and shall take all necessary actions to establish an immediate temporary control of the hazard until permanent control can be established.
- Employees shall immediately report all incidents or incidents occurring on the job to their supervisor, including industrial injury incidents no matter how slight.
- Employees shall cooperate and assist in the investigation of all incidents or incidents.
- Employees shall utilize all personal protective equipment provided.
- Have the responsibility and authority to shut down any operation not considered safe until condition is corrected, once Stop Work Authorization has been designated.

Competent Persons

- Employees who by virtue of demonstrated knowledge, experience and training have shown themselves to be competent, in accordance with current OSHA standards shall be designated as a Competent Person for the purposes of implementing, performing, monitoring safety activities within their scope of expertise.
- Competency designation shall be designated by the Facility Safety Manager.

Contractors and Subcontractors

- Follow all requirements passed down contractually from Citizens Coop.
- Execute Work activities according to the proper Safety procedures and policy having jurisdiction
- Ensure employees are properly trained to execute the Work
- Provide monitoring and control to assure the above
- Hold all lower tier subcontractors to the same requirements down to the lowest tier.
- Stop Work when an unsafe act or condition is present on any worksite.

Visitors

- Be aware that CITIZENS facilities and worksites contain hazards that you may be unaware and unfamiliar with
- Follow your assigned escort at all times and maintain line of sight
- Wear the proper PPE required for the location and areas being visited
- Follow all instructions provided including signage, barricades, and verbal instructions
- Do not cross any barricade, bypass any signage unless specifically directed to do so by the escort
- Be made aware of powered industrial vehicles at all times
- Be made aware of overhead or underground hazards

6.0 ENVIRONMENTAL CAUTIONS

Each facility, machine, item of equipment, system and materials are unique; which requires the person(s) performing work with them to refer to the operator, maintenance and service manuals, policies and procedures for specific instructions as to how to perform their work tasks safely to prevent damage to the local environment. Dedicated efforts shall be made to use only environmentally friendly materials and supplies over environmentally hazardous ones.

7.0 SAFETY REQUIREMENTS

Each piece of equipment, machine, system and work environment has its own safety procedure and requirements based on operator's and service manuals, identified hazards and Risks Hazard Analysis associated with the machine, system and task to be performed. These procedures shall be followed at all times.

8.0 RECORD KEEPING

Record Keeping is a primary element in any program and is a key programmatic element in validating and substantiating the performance of SH&E programs. Additionally, record keeping is vital to predicting and tracking past performance and providing a data set for future analysis and program correction. In order to meet its internal, customer and regulatory requirements various levels of the organization must maintain and archive records related to program implementation. Employees are informed of the provision of recordkeeping upon initial assignment and annually thereafter.

The following documents are considered Records and shall be maintained for the time duration indicated:

- Citizens shall preserve employee medical records for term of employment plus a minimum of 30 years.
- Citizens shall maintain employee exposure records, environmental and/or biological monitoring for 30 years.
- Citizens shall maintain a permanent record of SDS.
- Environmental test results shall be maintained for 30 years.
- Citizens shall maintain noise exposure records for 2 years.
- Citizens shall maintain safety committee minutes for 3 years.
- Citizens shall maintain records of tool box talks for the current and previous year.
- Citizens shall maintain copies of self and/or external inspections for 3 years.
- Citizens shall maintain a record of all training classes. A copy of the training record for each individual employee shall be kept in their personnel file for the term of their employment, or at least 3 years.
- Citizens shall maintain copies of the OSHA 300 log & 300A summary for 5 years.
- Citizens shall maintain copies of the first aid log for 5 years.
- The OSHA 300A Summary will be posted for 30 days beginning February 1 of the following year.
- Citizens shall maintain an incident file which shall include copies of:
 - Employer's First Report of Injury
 - Documentation that the employee's report of injury was given to the company within 24 hours of an injury
 - Supervisor's incident investigation report
 - All other claim supporting documentation

Understanding our clients may have additional posting and record keeping requirements, any and all non-confidential posters and reports will be made available at each facility or when requested.

Employee access to records is provided in a reasonable time (within 15 working days), place and manner. If there is to be a delay, communication will be made identifying when the records can be made available. Copies of medical records are provided at no cost to employees upon request. Any personal identifiers such as names, addresses, Social Security numbers, etc. will be removed from the records before access is granted.

If CITIZENS ceases to do business, CITIZENS shall transfer all records applicable to the successor employer. If there is no successor employer to receive and maintain the records, or if CITIZENS intends to dispose of any records required to be preserved for at least thirty (30) years, the employer shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of the business.

9.0 CONTRACT or PROJECT SPECIFIC PLANS

CITIZENS recognizes the necessity and importance of providing specific program elements and procedures whether based on geography or client. In this manner we can provide a scalable program with different levels of rigor depending on the needs and demands of a particular customer while maintaining an excellent foundation that can serve our stakeholders needs in the majority of our business segments.

The SH&E program may be modified by individual divisions with review and approval by both division and the Safety / HR Manager.

10.0 MEDICAL CARE and INJURY MANAGEMENT

Injury management is a post injury procedure designed to ensure quality medical care, contain medical costs, reduce opportunities for litigation and return injured workers to full gainful employment in the earliest possible time.

The soaring cost of Workers' Compensation insurance to our company will be contained. Rather than accepting injury related expenses as a fixed cost of doing business, we will be proactive in this program and focus our resources on:

- Educating our employees
- Loss reporting
- Utilization of Directed Care medical providers
- Mandatory Return to Work (RTW)
- Documentation

The success of this program is dependent on a strong partnership between our management staff, employees, medical care providers and our insurance company.

10.1 Injury Management

Reporting the incident is a concurrent action in order to maintain appropriate upper management response. Injury management starts with applying the appropriate level of medical

response from report only, through first aid, industrial first aid and minor medical treatment to emergency services. Each and every injury is to be assessed and given the proper level of treatment. The first and most critical step in this assessment is prompt and proper injury treatment.

First Line Supervisors, have the initial responsibility for care of the employee and implementation of the injury management process. The safety/HR manager has ultimate and overall responsibility to ensure the employee is provided proper care as appropriate for the injury/illness and injury severity. Outlines for injury and incident reporting are defined in "Event Reporting". First Line Managers shall ensure the injured employee is accompanied to the designated medical care facility.

All injuries, regardless of severity need to be reported. Employees and supervision may be subject to disciplinary action, or loss of benefits, for failure to report an injury promptly. Additionally, employees may lose benefits under the state worker's compensation regulations for failure to report within specified time periods. When in doubt, report it. All incidents involving personal injury shall be reported within 10 minutes.

10.2 Incident Reporting

The employee and supervisor are to fill out the local state Incident/Incident report forms in as required by that state's governing agency. The employee is to keep a copy and the supervisor shall turn the treatment report, and copy of the state form (if given one by the treatment facility) to their facility Safety/HR Manager. Incident/Incident forms are to be filled out for all injuries regardless of severity.

10.3 Incident Investigation/Root Cause Analysis Report

Injury management is a post injury procedure designed to ensure quality medical care, contain medical costs, reduce opportunities for litigation and return injured workers to full gainful employment in the earliest possible time.

10.4 Workers Compensation

The soaring cost of Workers' Compensation insurance to our company will be contained. Rather than accepting injury related expenses as a fixed cost of doing business, we will be proactive in this program and focus our resources on:

- Educating our employees
- Loss reporting
- Utilization of Directed Care medical providers
- Mandatory Return to Work (RTW)
- Documentation

The success of this program is dependent on a strong partnership between our management staff, employees, medical care providers and our insurance company.

10.5 First Aid and Medical Care

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The selection of physicians, clinics or hospitals is an important injury management decision. We will either directly or indirectly manage the medical care provided to our injured employees to the maximum extent permitted by our state's Workers' Compensation regulations. CITIZENS actively participates in employee medical treatment in concert with resources provided by our worker's compensation insurance carrier and medical care providers.

Employees are required to seek medical treatment at company contracted treatment facilities first unless there is an emergency. Employees will be requested to submit to a Drug and Alcohol test as an element of work related injury assessment and treatment.

Employee medical records or records which concern the health status of an employee are maintained by the treatment facility – their physicians, nurses or other health care professionals.

First Aid kits are installed in office areas and service vehicles for employee and First Responders immediate use. The Safety Officer shall regularly inspect kits to ensure they are filled with appropriate treatment items in accordance with current industry recommendations.

First Responders shall obtain and maintain certification in community First Aid from the American Red Cross or ASHI. The Site Safety Officer shall maintain records of certifications.

10.6 Medical Emergencies

Call 911 and have the injured individual transported by ambulance to the nearest emergency medical facility.

10.7 Modified Duty/Return to Work (RTW) Program

To effectively manage the costs incurred as a result of work related injuries, the following process shall be closely followed and monitored:

1. Ensure that initial treatment is provided. Immediately following an injury, provide necessary first aid and accompany the employee to a medical provider as required. Document all details of the date and time of the injury, the type of first aid provided and the name of the physician, clinic or hospital where the employee received treatment.
2. Notify Insurance Claims personnel, online or by phone.
3. Provide management and Human Resources with the appropriate information.

Information which shall be include includes:

1. A description of the employee's current job, with details on postures (standing, sitting, walking) and physical demands (lifting-weight and frequency, hours worked, tool usage, etc.)
2. What time they reported to work and number of hours worked before being injured.
3. A copy of the injury report describing how the injury occurred if available.
4. Attending physician's report. It is critical to obtain the treating physician's response to any work restrictions our injured worker may have. If the doctor has the job function evaluation as a guide, an informed response should be obtainable.
5. Date of employment

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6. Contact the employee. Employee contact should be made in person or by phone within 24 hours.
7. Reassure the employee of our company's commitment to their well-being.
8. Assess the employee's understanding of the treatment he or she received.
9. Ask if the employee has any specific questions about future plans, treatment, etc.

Follow up with the physician. Within 24 hours of initial treatment obtain details regarding recommended additional treatment, return-to-work expectations and specific job restrictions. Discuss a specific timetable for the employee's return to work. Maintain contact with the employee, physician and the claims handler. During the employee's absence from work, we will continue to monitor progress:

1. Contact the employee at least once every week to inquire about their recovery and express our concern for their return to good health.
2. Contact the physician periodically to discuss recovery progress and any changes in the timetable for the employee's return to work.
3. Keep our claim handler informed about the employee's return to work status.

Establish an injury management record. For each case involving lost time and/or follow up medical treatment, establish an injury management record. At a minimum, this record should include:

1. A copy of the injury report
2. Documentation of initial treatment
3. Copies of medical bills
4. A log of all phone conversations with the employee, physician and claim representative
5. Progress reports from the physician

All activities regarding treatment and recovery should be logged and documented whenever possible. Explain any progress toward return to work and discuss this with our claim representative and the physician or other parties involved. Indicate the date the employee returned to work and in what capacity (full duty, part-time, limited physical activity, etc.).

10.8 Fatigue Management

To ensure a safe working environment, CITIZENS provides a plan to manage fatigue and ensure that the risks associated with fatigue are minimized. Employees will be trained initially and annually on best practices and for controlling fatigue through several avenues including work balance, rotation and ergonomics. All training will be documented and logged within the training record management system.

To facilitate fatigue management, employees must not chronically use over-the-counter or prescription drugs to increase mental alertness. CITIZENS discourages employees from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off. Employees suspected to be under the influence will be susceptible to the Fitness for Duty reasonable suspicion screening to protect the worker and others working around the employee.

Different working conditions can dictate the need for rest breaks. CITIZENS will offer rest breaks to control fatigue, and when added work days are required, offer reasonable time off for rest and to increase mental fitness when necessary. Other plan aspects may include limiting work hours, controlling job rotation schedules and ensuring proper staffing.

When applicable, the use of ergonomic equipment will be implemented to minimize standing fatigue, lifting, temperature and other conditions. An analysis of certain work facilities and conditions will be completed to ensure safe and ergonomic conditions exist to minimize fatigue.

If an employee experiences fatigue while working in a safety critical environment; it is the employee's responsibility to report his/her concern to their foreman so corrective actions or job rotations may occur. Citizens' supervisors and managers are responsible for the wellbeing of his/her employees and shall make safety critical decisions and take appropriate actions to prevent loss

The state mandated injury report, is to be filled out for any injury exceeding facility administered first aid. The form is required to document and properly file all Worker's Compensation claims. With the assistance of the employee or supervisor, Safety Services is to ensure the form(s) are properly completed and filed.

10.9 Incident/Incident Investigations

The activity manager is responsible for ensuring the CITIZENS Incident Investigation and Root Cause Analysis forms for any incident regardless of severity are fully completed. With the assistance of the Safety/ HR Manager the forms are to be completed to support quality record keeping and aid in root cause analysis and review of practices and possible changes to safety expectations.

11.0 GENERAL

This program element encompasses industry standard best practices for evaluation of employees and pre-qualification of contractors, subcontractors and visitors. The sections below represent evaluations which are cost effective in implementation, enhance productivity and produce measurable results while minimizing risk exposure.

Certification and Qualification of personnel, contractors, subcontractors and visitors is a key component of managing risk exposure for SH&E concerns. Having the right people with the right qualifications on the job is first step to assuring delivery with the balance of Safety, Quality, and Value.

11.1 Fitness for Duty Program

CITIZENS strongly believes that a drug and alcohol free workplace is beneficial to all stakeholders and takes a zero tolerance stance against the use of drugs and alcohol in the workplace. We will implement the following program elements companywide:

- Pre-employment- All employees regardless of classification are required to pass a pre-employment drug and alcohol screen.

- Post-Incident- All employees regardless of classification are required to take a drug and alcohol screen if they are involved in an incident resulting in personal injury or property damage.
- Designate *Safety Sensitive* positions in accordance with current state and federal OSHA standards.

Fitness for Duty also includes an employee's ability to perform the duties of the job in a safe, secure, productive and effective manner. An employee's ability can be impaired due to illness, fatigue, or personal issues amongst other issues. CITIZENS Management is encouraged to "seek to understand" if an employee is working in a manner below his expectations or seems disconnected from work. Management is encouraged to talk to employees, offer reasonable time off without repercussions, or direct employees to the support offered through Citizens' employee assistance program.

11.2 Qualification

The first step in assuring safe performance in the workplace is assuring the qualifications and proper training of the individuals completing the work. These industries set benchmarks for qualification and training requirements are considered best practices in delivering a safe and quality product. CITIZENS takes a pro-active stance in assuring that our teams are qualified and properly trained to perform the work at hand.

Task Specific Certification – employees are required, at the time of hire to provide documents as proof of qualification to perform the specified tasks for which they are being hired. All training information will be documented and logged within the training record management system.

General Job Competency – Minimum qualifications for any role within the company will be determined based on several factors including but not limited to or inclusive of applicable licensing or certifications, education and work experience. When necessary, job specific training will be provided for new or transferring employees based on the tasks needing completion or standard tasks.

Vehicle Driving Safety - Only Authorized CITIZENS employees may drive and operate company owned or leased motor vehicles to perform their scope of work.

The driver of any CITIZENS vehicle must obtain, and maintain, a valid and current license to operate the vehicle.

Drivers shall not operate a motor vehicle of any type while under the influence of alcohol, illegal drugs, or prescription or over the counter medications that has the potential to impair their driving skills.

Authorized drivers of motor vehicles, will report any collision or traffic citation while driving on duty to their immediate supervisor within one hour of any incident.

Authorized drivers shall ensure that all loads are secured and within manufacture's specifications and limits of the vehicle. The vehicle shall only be utilized for its intended use, and be of the correct size to perform the duties.

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All vehicles shall be maintained and in safe working order prior to use.

Authorized drivers and any passengers of the vehicle shall wear seatbelts at all times when the vehicle is in motion.

Authorized vehicle operators will follow all safe driving behaviors such as:

- Hands-free cell phone use or Cell phone use prohibited while driving
- Not manipulating radios or other equipment which may cause a distraction
- Not exceeding the posted speed limits and maintains a safe driving distance between other vehicles.

11.3 Safety Training Requirements

Each and every employee will receive a basic Safety Orientation to Citizens, our methods and approach to safety, health environmental issues within 3 days of hire. Employees, Supervisors, Managers as well as senior management will additionally be trained to adequately recognize and control hazards in the work place and fulfill the roles and responsibilities of their position.

11.3.1 Baseline Requirements

OSHA Training - It is required, regardless of position, trade or job classification. Training documentation shall be logged within the training record management system.

Safety Trained Supervisor or Person in Charge (PIC) - CITIZENS advocates additional safety training for all supervisory staff and management classifications. Although not a requirement of employment, OSHA 10 and 30 Hour and other such safety training designations will be encouraged and supported within this program.

CPR & First Aid - It is a requirement that all supervisors, maintenance personnel and First Responders will hold a current and valid CPR/First Aid training card within 6 months of hire. CPR/FA/EAD trainers provided by CITIZENS shall be certified by the American Red Cross, American Heart Association or ASHI, depending on availability of training resources.

All training shall be documented and logged within the training record management system. All CITIZENS facilities and vehicles will be provided with first aid kits easily accessible and adequately stocked based on the work and environment identified. Regular assessments of the first aid kits shall be performed to ensure adequate supplies are available.

Stop Work Authorization - All employees who can demonstrate the minimal level of regulation training shall be Designated Persons under the regulation for facilities inspection and given Stop Work Authorization – responsibilities and training before initial assignments include stop, notify, correct then resume. No work will be allowed to continue until all issues or concerns have been addressed. Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated. Management will document, support and rectify any legitimate Stop Work concerns. All Stop works will be reviewed by management to identify issues, trends and opportunity for improvement. Any follow-up will be communicated to ensure a closed loop program.

Competent Persons – CITIZENS Safety Management is responsible, in coordination with facility management for verifying and identify competent employees and be responsible for verifying employee capabilities and/or competency on tasks before allowing the employees to work independently.

Where required by applicable Safety, Health or Environmental procedure, the PIC will be trained in the applicable regulation and work practices. It is the responsibility of the safety department to qualify each Competent Person based on either:

- 1) applicable work experience
- 2) verifiable education and study, or
- 3) a combination of both.

All such designations will be documented in the employee file.

11.3.2 New Employee Orientation

All new employees will complete safety orientation training within the first 2 days of being hired. New employee training will cover the basic safety requirements necessary to cover the majority of work performed company wide. Training will be documented and logged within the training record management system. Topics will be reviewed periodically by the Safety Leadership Team to assure that they represent the most typical work and training needs company wide.

11.3.3 Short Service Employees (Temps)

Short Service Employees shall be monitored for compliance with all Safety, Health and Environmental policies and procedures. Once the short service employee has demonstrated competency and compliance with the host facilities policies and procedures, they may be eligible for direct employment.

A mentoring system shall be implemented to provide guidance to Short Service Employees and assist in their development.

11.3.4 Facility and Site Specific Orientation

All new employees will complete facility and/or site specific training if applicable to the work being completed within a specific division or on a customer facility requiring additional orientation. Managers are responsible for assuring that facility /site specific training is completed prior to engaging in work not contemplated in the company's New Employee Orientation. Eye wash and safety shower locations will be identified at facilities where employees may be exposed to injurious or corrosive materials and provided by hosing facility.

11.3.5 Required Training Documentation

- Date
- Location (building, room, floor, etc.) where the meeting was held.

- Time it started and ended.
- A listing of topics reviewed or discussed.
- The instructor (for each topic if more than one instructor was involved).
- The name of each person attending, as well as those required to receive the training involved who were not present shall be documented.
- A list of all matters that were found to require some type of follow-up or further action (This includes the training of those who were unable to attend).
- The source document or audio-visual presentation, if one should be identified.
- Measurement for learning level (test)

11.3.6 Sources of Training Materials

- National Safety Council
- Insurance Agent
- Insurance Carrier
- Safety Rules
- National Fire Protection Association
- American Society of Safety Engineers
- American National Standards Institute
- Federal and State Occupational Safety and Health Administrators
- CITIZENS Safety Health and Environmental Program

11.3.7 Contractor, Subcontractor and Visitor Pre-Qualification

A graded approach will be used to evaluate and pre-qualify contractors to perform work or provide services at CITIZENS facilities, worksites, and equipment. At a minimum all contractors and subcontractors who are to be added to the vendor list shall submit and maintain certificates of insurance that include minimum coverage for General Liability, Auto Liability, and Worker's Compensation. Coverage requirements are outlined in Citizens' current agreements.

11.3.8 Contractor and Subcontractor Flow-Down and Control

Once contractors are pre-qualified it is paramount to establish the applicable rules, specifications, and requirements applicable to the work. Through contract management CITIZENS shall assure each and every subcontractor is bound to the procedures, rules and regulations which CITIZENS has bound to the client. This will be accomplished in a flow-down clause in CITIZENS current subcontract agreement and including a provision requiring 1st tier subcontractors to flow the same requirements down to the lowest tier.

Two options exist for contractors and subcontractor's applicable policy and procedure for mitigating and controlling EH&S exposures.

Option 1 is for contractors and subcontractors to work under the applicable EH&S program submitted and approved between CITIZENS and the client.

Option 2 involves the subcontractor submitting sections, or specific procedures for Citizens review and approval for the specific project. This will be common when specialty contractors are engaged that have project specific hazards which are not addressed by Citizens program.

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Similar to facility specific procedures changes noted above, a CSSP may not contain two elements that cover the same exposure.

Site Supervisors shall include subcontractors in all pre-job safety orientations and pre-job meetings. Subcontractor crews will also be required to attend daily and weekly tailgate meetings, any AHA's, JHA's or Pre-Task Plans tied to work or work affecting the subcontractors progress and safety assessments and inspections.

The contractor and subcontractor's safety performance will be reviewed and scored by the facility Safety Manager to identify safety recognitions and concerns. The contractors and subcontractors will be provided feedback on items/processes that were favorable to a safe work environment and outlined issues with safety performance concerns, supporting documentation and suggested plans to rectify any issues on future facilities. The safety scoring will be provided to the general manager for his records to support future decision making on partnering with subcontractors on future job opportunities.

11.4 Field Observation and Surveillance -Behavior Based Safety Program (BBSP)

Verification of performance and implementation is key requirement for program effectiveness. CITIZENS has developed several observation and audit process that focus on minimizing the impact on productivity in the workplace, minimizing administrative burden and overhead, and maximizing the impact and effectiveness of verification. These observation and audits are identified as CITIZENS Behavior Based Safety Programs (BBS).

To provide an objective process to measure the successful implementation of safety policy and procedure, employee training and performance through the use of documented supervision and observation performed in the field, and to provide a data base of leading indicators to support, training, solutions, and updates to safety policy and training. Observation and Auditing applies to all field personnel.

11.4.1 Management Involvement

It shall be the responsibility of all CITIZENS management and supervision to perform safety observations during facility walkthrough. Personnel are to actively participate in the program that coincides with their position within the SH&E program, or the program they select during initial training if their position is not specified in Program Implementation.

Management may choose to move a supervisor between programs if deemed beneficial to the overall success of the observation program. The first step in actively demonstrating participation in the observation program will be by members of management carrying and displaying observation cards in the workplace and on job sites.

11.4.2 Compliance Program – Corrective Actions

The Corrective Actions shall be taken based on the Behavior Based Safety (BBS) observation process. Each member of management participating in this process is tasked with citing poor safety performance in relation to established, rules, regulations,

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policies and procedures. Observers need to follow the following four step process for a disciplinary interaction.

- 1) Identify the problem or behavior. Under the safety observation program, it will always be a Safety Issue.
- 2) Question the employee to determine the root cause, or significant contributing factor to the infraction. The choices and guidance are as follows:

- BELIEF- A belief is representative of a conscious thought or decision on the employee's part. For example, a typical response would be similar to "I was in a hurry and didn't want to stop what I was doing too..."
- HABIT- A habit is representative of an unconscious decision or action on the employee part. Years of training or performance in a similar manner leads to an unconscious action. For example, the employee may respond "I wasn't thinking about it and I've always done it this way."
- BARRIER- A barrier represents an impediment that hindered or prevented the employee from complying with the policy, procedure or rule. For example, the employee may respond that "I asked my foreman and we were out of safety glasses this morning."
- PERCEPTION- A perception can be a belief but is typically an indicator of a miscommunication from management or lack of comprehension during training. For example, the employee may respond "I didn't know you wanted it done that way." Or "We received training last month that this was the proper procedure."

- 3) Address and communicate to the employee the consequences if this type of violation was to happen again in the future. The options are explained in the Human Resources Manual.

- 4) Address the supervisor comments and provide a brief description of the policy or procedure violation. Address the employee comments and give them the opportunity to indicate whether they understand the behavior and whether they agree with the consequences.

The overall goal for the Corrective Actions program is to have management in the field focused on compliance less than 10% of the time. The intention of the Corrective Actions program is to provide a presence in the field that compliance based safety enforcement still exists. The Behavior Based Safety program has limited effectiveness in a program which doesn't contain a compliance element.

11.4.3 Behavior Based Safety – Green Card

The Green Card program is a behavior based observation program focused on identifying and correcting workplace behaviors that have a high correlation with risk of injuries or incidents. The process is designed to focus on easily identifiable behaviors and NOT regulation, policy or procedure compliance. This focus allows junior members of management, supervision or any trained CITIZENS employee to more easily

participate in the program. This process is no-name, no-blame and only records data. Because identifying information isn't collected it can't be used for disciplinary reasons.

11.4.4 Behavior Based Safety Training

Each person trained in BBS observations will participate under the goals and objectives of a division and be accountable to the Division Manager for completing a quota of observations per week based on the number of craft employees working in the field.

Upon arriving at the facilities the observer should identify an individual or workgroup to observe and complete an observation and feedback by following the proper steps outlined as follows. Training on observations will include:

- 1) The Observer should announce his presence to the workers and show them the Green Card. If they aren't familiar with the process the observer should explain the key basics, No-name, No-blame and behavior NOT policy based. Observations may occur at any time.
- 2) The Observer should monitor a task or process completed by the workers. This should take no longer than five minutes.
- 3) The Observer should tally one green card for each employee observed during the activity. If there are three employees involved, the Observer will fill out three cards. Check marks should be placed in the box next to each behavior that was observed being completed safely. The observer should check all behaviors observed during the activity, this can result in a single card having five or six different behaviors or more.
- 4) Safe/Unsafe Determination. Safe/Unsafe determinations are made based on whether a potential exposure was created or unmitigated because of the employee's behavior. It differs from compliance in that you can violate a rule or policy without creating an exposure, for example LOTO procedures require the use of red colored or red banded locks. Under the BBS observation an employee using a grey lock wouldn't be considered an Unsafe behavior. The hazard is still properly controlled, just with the wrong color of lock. If all activities were performed safely the Observer thanks the workers for their focus on safety. If the behavior is determined to be Unsafe, the observer follows the next steps in correcting the issue and completing the observation. Step 6) - Don't automatically assume that something was done incorrectly, approach the issue with a questioning mindset, for example instead of saying "I noticed you were doing this incorrectly", say "I have a concern about how you were doing that, can you tell me about why you do it that way?" Question the employee to determine the root cause, or significant contributing factor to the behavior. The choices and guidance are as follows:
 - BELIEF- Belief is representative of a conscious thought or decision on the employee's part. For example, a typical response would be similar to "I was in a hurry and didn't want to stop what I was doing too..."
 - HABIT- Habit is representative of an unconscious decision or action on the employee part. Years of training or performance in a similar manner leads to

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an unconscious action. For example, the employee may respond "I wasn't thinking about it and I've always done it this way."

- BARRIER- Barrier represents an impediment that hindered or prevented the employee from complying with the policy, procedure or rule. For example, the employee may respond that "I asked my foreman and we were out of safety glasses this morning."
- PERCEPTION- Perception can be a belief but is typically an indicator of a miscommunication from management or lack of comprehension during training. For example, the employee may respond "I didn't know you wanted it done that way." Or "We received training last month that this was the proper procedure."

5) Coach the employees on the proper behavior and present the coaching as if you are concerned for their wellbeing and the security of their family, not because your wanting to control risk and exposures for CITIZENS or compliance concerns with OSHA or other regulation, policy compliance – Mentor/Coach process.

6) Indicate whether the employees were receptive or non-receptive to BBS efforts.

7) Collect and turn in cards weekly to the designated collection point.

The overall goal for the Green Card process is to have management, supervision, and pier to pier interactions in the field at least once, per employee, per month. The objective is to change the workers root behavior. Overtime it becomes automatic and part of the culture of the work, not just compliance when they are aware someone is watching.

11.4.5 Reporting, Tracking and Trending

All observation program data will be collected and reported monthly in a database or spreadsheet. All Corrective Actions will become part of the employee's personnel file and used for disciplinary action as appropriate, in accordance with current Human Resources guidelines. The Safety / HR Department will produce monthly BBS reports to be distributed to management.

Monthly reports will include the following information:

- Ratio of Safe to Unsafe Behaviors- Detailed Monthly, Cumulative for YTD
- Information broken down by operating division
- Detailed percentage of safe vs. unsafe behavior by activity/behavior type
- Actual observation Activity vs. Activity Goal
- Leading indicator identified issues with direction for training and/or toolbox talk reviews
- Communication outlines to be delivered to the general workforce for each division

Reports identify trends. Trends drive action. Data collected and summary reports will be used to determine the effectiveness of actual activity vs. goals, behaviors that are potential risks, identify barriers requiring management response, and perceptions that point to training & communication effectiveness. Reports will be made available to any customer requesting the information for review of program progress and data evaluation.

11.5 Hazard Analysis Program

Proper hazard analysis and task/work planning is a key element in controlling hazards and exposures in the workplace, specifically matching work methods and controls with identified hazards.

To provide a consistent approach to identifying hazards which are routinely associated with the work performed by Citizens Coop.

11.5.1 Site and Facilities Hazard Evaluations (JSHE)

Site and Facilities Hazard Evaluations are typically completed by customers or property owners on either a formal or informal basis. This information is then communicated to the contractor and identifies the potential hazards present in the work to be completed that may otherwise be unforeseeable to contractor personnel. In cases where the customer provides a formal JSHE, the supervisor will review the document and determine if the scope of work will impact or be exposed to any of the identified hazards. In cases where the customer doesn't provide an upfront evaluation, the supervisor will ask as part of the project planning phase.

11.5.2 Activity Hazard Analysis (AHA)

Activity Hazard Analysis is completed by CITIZENS safety personnel and utilizes the policies and procedures included in this program. It is expected that the policies and procedures outlined in this program are adequate to control the hazards that are anticipated or associated with the activities detailed in each of the safety, health and environmental programs. However, if a specific job or task presents a hazard that is not covered by a current procedure, the project supervisor shall stop work and initiate a Job Hazard Analysis if the exposure is a onetime event. Supervisors can also initiate an Activity Hazard Analysis to prompt the drafting of a new Safety Procedure to cover an activity that was previously not contemplated in the SH&E Program.

AHAs and the resulting project specific safety plans are facility specific or project specific documents and are to be on site and available for reference at all times during the performance of the work.

11.5.3 Job Hazard Analysis (JHA)

Job Hazards Analysis is the front line level evaluation of work which is either non-routine, doesn't fit well within the scope of a current procedure, or has the potential for hazards that aren't controlled elsewhere in this EH&S Program. JHAs are also used to provide task level sequencing for additional control of high hazard activities or high risk activities, such as a critical lift, line movement or boring. They may also be requested by clients who require a detailed, task order document to further detail the process outlined in a CITIZENS Safety Procedures.

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JHAs are a task level document and are to be at the facility, office, and on trucks at all times during the performance of the work and immediately available to crew members for guidance.

11.5.4 Pre-Task Planning (PTP)

Pre-Task Planning is a line level tool in identifying hazards and implementing controls related to the immediate tasks in the scope of work. While the Safety Program includes hazards evaluations and controls on the global level related to scopes of work, the Pre-Task Plan is used to get the crews to stop and think about the activities that are going to be completed in the immediate future, what hazards are associated with those tasks and which control elements or procedures from the Safety Program are going to be used to mitigate those hazards.

The supervisor is to start the shift of task with an oral presentation of the scope of work to the crew, the tasks to be accomplished, the hazards that are involved and the mitigation steps taken to control those hazards.

11.5.5 Risk Assessment

CITIZENS will classify or rank risks utilizing a Risk Control Matrix defining severity vs. consequence, based upon the regularity of the task performance. This will allow for hazard mitigation planning utilizing engineering, administrative and lastly personal protective equipment. The use of all three controls can be used in conjunction if there is a greater level of worker safety because a combination is used. If the use of controls does not reduce the risk and a task is identified as intolerable, CITIZENS will not proceed with the task until additional controls can be introduced to reduce the severity.

CONSEQUENCE					PROBABILITY				
Severity	People	Assets	Environment	Reputation	A	B	C	D	E
					Not Done	Rarely	Once a week	Several Times in a Week	Multiple Times in a Day
0	No health effect	No damage	No effect	No impact					
1	Slight health effect	Slight damage	Slight effect	Slight impact					

2	Minor health effect	Minor damage	Minor effect	Limited impact				
3	Major health effect	Localized damage	Localized effect	Considerable impact				
4	Single fatality	Major damage	Major effect	National impact				
5	Multiple fatalities	Extensive damage	Massive effect	Global impact				
Key	Manage for continuous improvement (Low)			Incorporate risk reduction measures (Medium)			Intolerable (High)	

11.5.6 Risk Identification

Employees are trained in the hazard identification process. Employees will be trained in the hazard identification process including the use and care of proper PPE. This includes the identification process for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work
- Legal and other requirements
- Previous incidents and non-conformances
- Sources of energy, contaminants and other environmental conditions that can cause injury
- Walk through of work environment

11.5.7 Hazard Mitigation

Risk assessed hazards are compiled with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented controls methods including engineering or administrative controls and PPE required into the work facility hazard assessment of the facility specific SH&E plan. No work will begin before the work facility assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.

If an existing or potential hazard to workers is identified during a hazard assessment CITIZENS must take measures to eliminate the hazard, or if elimination is not reasonably practicable, control the hazard. If reasonably practicable, CITIZENS must eliminate or control a hazard through the use of engineering controls. If a hazard cannot be

adequately controlled using engineering controls, CITIZENS must use administrative controls that control the hazard to a level as low as reasonably achievable. If the hazard cannot be adequately controlled using engineering and/or administrative controls, CITIZENS must ensure that the appropriate personal protective equipment (PPE) is used by workers affected by the hazard. CITIZENS may use a combination of engineering controls, administrative controls, and personal protective equipment if there is a greater level of worker safety because a combination is used.

11.5.8 Audit Programs/Facilities Inspection

The audit program focuses on all aspects of safety and health management, but will concentrate on the implementation and effectiveness of the safety, health and environmental management system (SHMS).

The program has four goals:

- To facilitate improvement in safety and health performance
- To help educate site management in safety and health management
- To improve the implementation and effectiveness of the site SHMS
- To identify best practices that can be shared within the corporation.
- Audits will be conducted by a team or sub contracted inspector. Audits will require 1 to 8hrs depending on the size and complexity of the site, and the safety and health issues identified. Audits will conclude with a site SHMS improvement plan where necessary. For those sites that require an improvement plan, Citizens management will be accountable for the timely and effective implementation of the plan.
- In addition to on-site audits, all CITIZENS offices, off site locations, and worksites will complete an annual SHMS survey. The survey will be used to gauge implementation of the CITIZENS SHMS.

Site inspections should be conducted on a daily, weekly, or monthly basis to identify any changes in working environment, hazards, or any other issues that may create a hazardous workplace. CITIZENS site supervisor will add any necessary documentation to their PTP and communicate to management and supervision any potential issues so they are either controlled or mitigated.

11.5.9 Reporting, Monitoring and Control

This program element is vital to the health and continued success of the overall program. Reporting issues, properly investigating and determining root cause and potential programmatic failures is key to the ability of management to make corrections. Further an oversight body that is qualified to analyze performance data and make recommendations to senior management is vital to the steady and consistent development of the program and maintenance of the culture.

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To provide key program components that establish clear channels for communication and criticism, free from harassment, intimidation and retaliation, to promptly and properly respond to incidents and complete thorough investigations and analysis, provide for internal and external auditing, and establish a body for evaluating success and recommending corrections for failure.

Event Reporting - Several classifications of potential or actual issues fall under event reporting. Items that fall under the jurisdiction of this program must be safety or risk related; primarily involving the risks of harm to persons and the risk of damage to property. Quality issues, Security issues, and other do not fall under the requirements of this Program.

Stop Work Event - At any time that work is stopped on a project either by customer order, or CITIZENS Stop Work Authorization, the Hosting facility or site supervisor will be notified immediately. Work shall not commence until the issue has been resolved and the crew released back to work by the Hosting facility or site supervisor.

Property Damage - Any event or incident resulting in physical property damage it will be reported to HR and the supervisor on duty and to the facility Safety/HR Manager within 1 hour. Damage under \$250 may be reported by email or text. Property damage over \$250 shall be reported by phone or in person.

Injury to Persons - Any event or incident resulting in physical injury to a person, whether employee, contractor, subcontractor, client, visitor will be reported to the site supervisor within 15 minutes and to the facility Safety/HR Manager.

First Aid - All cases of basic first aid will be recorded on the proper form and reported to the Safety/HR Manager.

Upper Management Notification - Safety/HR Manager will report events upon notice and within 2 hours of the event to upper management.

OSHA Notification - Any event resulting in death, or hospitalization of 1 or more persons from a work related incident or incident will be verbally reported to OSHA within 8 hours. The Safety/HR Manager is responsible for reporting to OSHA at 1-800-321-6742.

Near Miss - Any event or issue that results in an actual exposure to a hazard but no injury shall be classified as a near miss and reported to the client if required.

11.5.10 Incident Investigation

Each event classified as Property Damage or Injury to Persons will be investigated by the Site Supervisor and the Safety/HR Manager if applicable. The extent of the incident investigation should reflect the level of seriousness of the incident utilizing root cause analysis. Site Supervisors or Safety Managers will be trained on and should adhere to the following guidelines when completing an incident investigation.

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- Go to the scene of the incident as soon as possible; preserve the condition of the scene until the appropriate facts can be gathered.
- Talk to the individuals directly involved; stress getting the facts and not focusing on cause or blame. Have the individuals prepare a written statement in their own words detailing the facts.
- Talk to witnesses, stress getting the facts and not focusing on cause or blame. Have the witnesses prepare a written statement of the facts that they personally viewed, or heard.
- Take Pictures if appropriate.
- LISTEN for clues in the conversation around you. Unsolicited comments often have merit.
- STUDY possible causes, scenarios, contributing factors, primary factors, unsafe practices and behaviors.
- CONFER with subject matter experts and discuss possible conclusions
- WRITE your incident report giving a complete and accurate account of the incident. Do NOT offer opinions, include hearsay, or draw conclusions that aren't supported by the facts.
- DO include the original statements and pictures to substantiate the conclusions, refer to them where appropriate in the narrative report.
- DO report preliminary facts to stakeholders if necessary. Do NOT speculate on or draw conclusions until the investigation is complete.

Any equipment needed to complete the investigation will be made available upon request to the risk management group, including writing equipment, measuring tools, cameras, recorders, PPE, flagging operations, etc.

Any evidence such as people, materials, equipment, etc. will be preserved, secured or collected to ensure investigation integrity.

11.5.11 Completing the Report

Once the investigation process is complete and the facts are known, prepare a narrative report that is appropriate to the severity and complexity of the incident. At a minimum the report should include the following items:

- Date and time of the incident
- Where the incident occurred
- Parties involved
- Witnesses, name, title and firm
- Summary of the incident
- Incident details
- Root cause analysis
- Contributing factors

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- Conclusions including summary of violations of regulation, policy, or procedure
- Maximum possible and possible outcomes, severity and frequency potential
- Recommended corrective actions

Once complete the report should be reviewed and initialed by the Safety/HR Manager and archived for review by the Safety Leadership Team at the next meeting. Defined incidents must be reported to applicable regulatory agencies within 8 hours of their discovery. Incidents must also be reported to the client/customer as soon as possible or in a timely manner (within 24 hours of the incident).

11.5.12 Follow Up

If the conclusions of the report point to programmatic or procedural failures a corrective action plan needs be developed to address the weaknesses and a timeline for correction. The Safety/HR Manager is to oversee the implementation and close out of all corrective actions.

11.5.13 Audits and Assessments

Audits are formal activities used to determine the adequacy of and adherence to established project controls, design specifications, codes and standards, or other contractual, license or permitting requirement. Audits are conducted using formal checklists and are documented in a formal written audit report. Audits are generally compliance oriented and are performed by a qualified individual in EH&S. In order to meet our regulatory requirements with the Worker's Compensation Administration, a yearly audit will be undertaken to review program performance. The audit report will be forwarded to the Safety Leadership Team for review and development of corrective action plan. Do you have these?

Assessments are conducted by CITIZENS Industries' Risk Management and typically delegated to a Safety/HR Manager or Safety Leadership Team Member. Assessments are used to judge the effectiveness of an activity or group of activities rather than compliance.

11.5.14 Safety Leadership Team

The senior leadership team is tasked with assisting senior management in establishing and maintaining a safe and efficient workplace, and promoting the overall safety culture. Members of the Safety Leadership Team can include any member of Citizens Coop.

The Safety Leadership Team is an advisory board (Safety Committee) and will discuss topics to an ultimate conclusion where each member votes to support or not support the recommendation of change to senior management.

The overall mission of the team is to periodically review the safety practices of the company and evaluate ways to meet all Citizens' and customer requirements while removing cumbersome practices. By discussing, suggesting, testing and ultimately

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recommending good sound practices to senior management, it is envisioned that the team can help reduce the costs of operating and increase overall performance.

GOALS- The team is responsible for discussing and recommending a set of goals for each calendar year, to be submitted and approved by senior management.

ACTIVITY- The team will meet on a quarterly basis to accomplish its goals and objectives. Does this occur and do you produce minutes of the meeting? The team will discuss incidents, new training requirements, employee suggestions, and future educational needs as they related to EH&S, and recommend policy changes and countermeasures for program improvement. Other actions should include:

- Review quality of incident investigations
- Review lessons learned and corrective action plans
- Review new employee orientation topics
- Review results of observation program
- Participate in drafting and reviewing program elements and procedures
- Act as a consultative body for the company on EH&S issues and problems

RECORDS- Minutes will be taken at each meeting and archived for reference. A secretary will be appointed at the start of each meeting to take the minutes.

12.0 Discipline

CITIZENS continues to support positive punishment as a necessary component of an effective program for modifying employee behavior to meet SH&E requirements and objectives. Although our primary management focus is on positive reinforcement through our Behavior Based Observation program, the following disciplinary guidelines remain to help identify and quickly address employee behavior that places the health and safety of our employees at risk. Disciplinary actions are not limited to lack of safety actions of employees but can also be tied to physical inspections of work areas.

To provide guidelines for enforcement of safety rules, procedures, policies, and directives from appropriate management personnel. The following disciplinary guidelines apply to infractions of SH&E related matters and are not to be interpreted as the management disciplinary program or corrective action program for quality assurance.

Personnel will be subject to disciplinary action for violations of safety policy or procedure. Such action may include any one or more of the following depending on the severity of the violation.

Personnel shall be afforded instructive counseling and/or training to assure a clear understanding of the infraction and the proper conduct under company guidelines. However, nothing in this policy will preclude management from terminating an employee for a safety violation. This is not a progressive discipline system and any safety violation may lead to an employee's termination without prior instruction or warning. Management reserves the right to impose whatever disciplinary action it deems appropriate.

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- Verbal warning with documentation in personnel file.
- Written warning outlining nature of offense and necessary corrective action with documentation in personnel file.
- Disciplinary suspension with documentation in personnel file.

Termination

Management, including supervisory personnel, shall be subject to disciplinary action for the following reasons:

- Repeated safety rule violation by their department employees.
- Failure to provide adequate training prior to job assignment.
- Failure to report incidents and provide medical attention to employees injured at work.
- Failure to control unsafe conditions or work practices.

Zero Tolerance Policy

CITIZENS recognizes site and facility specific requirements and the general industry and construction use of zero tolerance policies related to specified safety infractions.

13.0 Process Safety Management

The purpose of Process Safety Management (PSM) is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries. The requirements of a Process Safety Program are outlined in OSHA 29 CFR 1910.119. CITIZENS employees shall be required to abide by PSM safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping, and controls over entrance to a facility. Safe work practices will be covered during facility-specific training courses. All training will be documented and logged within the training records management system.

14.0 Hot Work Program

Before cutting or welding or heat producing activities such as cutting and grinding are permitted, the area must be inspected by the individual responsible for authorizing and issuing Hot Work Permits at CITIZENS facilities. CITIZENS employees will not be allowed to perform hot work until a hot work permit is obtained from the facility site supervisor, or site safety representative.

15.0 Industrial Hygiene Procedures (IHP)

Industrial Hygiene (IH) is the practice and science of Anticipation, Recognition, Evaluation, Communication and Control of environmental stressors in, or arising from, the work place that may

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result in injury, illness, impairment, or affect the wellbeing of workers. These stressors are divided into the categories Biological, Chemical, physical, Ergonomic and Psychosocial.

This procedure applies the necessary steps and guidance to ensure that all chemical, biological, physical, and ergonomic hazards are identified, evaluated, and controlled in order to reduce the risk of work-related disease or illness. This is accomplished through pre-job hazard evaluations, worker and workplace exposure monitoring and planning and implementation of proper controls by qualified individuals where necessary.

The Site Supervisor has the responsibility for ensuring the provisions of this section are followed and for ensuring that the necessary employee training and equipment is provided. They are responsible for assuring that subcontractors, visitors and other persons accessing the job site or facility are properly trained or guarded from exposure.

Person in Charge

The PIC has the responsibility for direct oversight of work site conditions and employee supervision. The PIC is responsible for ensuring that all employees are aware of the restrictions and requirements of this procedure.

Employees

The employee has the responsibility for ensuring that they follow the regulatory requirements and training requirements as outlined in this procedure and for use of assigned PPE in a proper manner. All employees are responsible to Stop Work if the conditions change or the work cannot be completed in compliance with this procedure.

15.1 Industrial Hygiene Procedure

Job Hazard Assessment and Hazard Control Planning of work sites and facilities hazards and hazard control planning are initiated through communication of upcoming job scopes and work plans. This is a formal process in some cases and an informal verbal process in others. The site supervisor and/or safety/HR manager is responsible for completing the hazards review for the scope of work and identifying work related hazards including potential IH hazards.

The work site supervisor should at a minimum, review the following information if available. Job scopes and work plans include:

- Facilities Hazard Evaluations (JSHE) documents provided by the client
- Other documents communicating job scopes or work plans provided by the client
- Documents communicating work hazards, such as Safety Data Sheets (SDS)

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Following review of the documents available and initiating conversations appropriate to complete an initial assessment the site supervisor should then decide whether additional evaluation is necessary or if the scope of work can be completed under the controls and procedures outlined in the company SH&E Program.

After evaluations are complete the site supervisor assures that the information is delivered and communicated to the appropriate employees. Information provided supervisors and workers include:

- Initial identification of IH-related hazards;
- Control methods to control identified hazards;
- Instructions for further assessment by the IH Team during the performance of the job.

15.2 Additional Evaluations & assessments

When necessary the Safety/HR Manager may engage resources and assistance from Risk Management and from an outside Industrial Hygienist or Environmental Specialist. A formal Activity Hazard Analysis should be completed to conduct a comprehensive review of the tasks and hazards involved and the necessary work steps and precautions necessary to control the hazards.

CITIZENS commonly works with specialized outside IH resources and specialty environmental remediation and planning companies.

One of the following methods will be employed to provide an additional level of assessment as part of a comprehensive Activity Hazard Analysis.

15.3 Walk Through Survey

A traditional method applied by Industrial Hygienists to initially survey a worksite, workplace or environment is used to determine both the types and possible exposures from hazards (e.g. noise, chemicals, radiation, traffic). The **Walk Through Survey** can be targeted or limited to particular hazards such as silica dust, or noise, to focus attention on control of those hazards.

15.4 Electronic Hazard Survey Equipment

An Industrial Hygienist may use one or a number of commercially available electronic measuring devices to measure noise, vibration, ionizing and non-ionizing radiation, dust, solvents, gases, et cetera. Each device is often specifically designed to measure a specific or particular type of contaminate.

15.5 Dust Sampling

Nuisance dust is considered to be the total dust in air including Inhalable and Respirable fractions. Various dust sampling methods exist that are internationally recognized. Inhalable dust is determined using the modern equivalent of the Institute of Occupational Medicine (IOM)

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MRE 113A monitor. Inhalable dust is considered to be dust of less than 100 micrometers Aerodynamic Equivalent Diameter (AED) that enters through the nose and or mouth.

Respirable Dust is sampled using a 'cyclone' dust sampler design to sample for a specific fraction of dust AED at a set flow rate. The respirable dust fraction is dust that enters the 'deep lung' and is considered to be less than 10 micrometers AED.

Nuisance, Inhalable and Respirable Dust fractions are all sampled using a constant volumetric pump for a specific sampling period.

15.6 Chemical Sampling

Two types of chemically absorbent tubes are used to sample for a wide range of chemical substances. Traditionally a chemical absorbent 'tube' (a glass or stainless steel tube of between 2 and 10 mm internal diameter) filled with very fine absorbent silica (hydrophilic) or carbon, such as coconut charcoal (lipophilic), is used in a sampling line where air is drawn through the absorbent material for between 4 hours (minimum workplace sample) to 24 hours (environmental sample) period. The hydrophilic material readily absorbs water soluble chemical and the lipophilic material absorbs non water soluble materials. The absorbent material is then chemically or physically extracted and measurements performed using various Gas Chromatograph or Mass Spectrometry methods.

In the last few decades, advances have been made in 'passive' badge technology. These samplers can now be purchased to measure one chemical (e.g. formaldehyde) or a chemical type (e.g. ketones) or a broad spectrum of chemicals (e.g. solvents). They are relatively easy to set up and use.

15.7 Workplace/ Worksite Exposure Monitoring

Workplace or Worksite monitoring will be put in place as necessary to support the requirements outlined in a specific AHA. Workplace/site monitoring may also be requested by Citizens in order to share data about hazards at an off site premises. Workplace monitoring is designed to assess worker exposure to chemical and physical hazards (including personal, area, wipe, and bulk sampling) and generate quantitative results to assure compliance with exposure threshold limits and permissible exposure levels.

15.8 Common Workplace Hazards with IH Concerns

Plant Managers will be trained to identify common activities have the potential for Industrial Hygiene Hazards. While reviewing scope documents and hazards assessments, Plant Managers should be keen to identify the potential of any of the following apply at all activities, facilities and sites.

15.8.1 Hazardous Communications – Employee Right to Know

It is the policy of the Company, that the first consideration in the performance of work shall be the protection of the safety and health of all employees. CITIZENS requires written site specific Hazard Communications Programs to be developed for all facilities

to ensure all employees receive adequate information and training relevant to the possible hazards which may be involved with the various hazardous substances used in the Company's operations and processes.

15.8.2 Bloodborne Pathogens Exposure Program

Effective pre-job hazard analysis by the facility director shall identify the presence of blood borne pathogen hazards and their potential impact on employees, visitors, contractors and product.

Specific procedural requirements shall be in place to manage blood borne risk areas and to control exposures to the blood borne pathogens to ensure compliance with all OSHA, FDA and industry standards. Those requirements are specific to each plant and are derived from basic Integrated Safety Management principles – Scope of Work, specific hazard, identified controls, implementation of the control and evaluation of the effectiveness of the controls.

Site Supervisors shall ensure that work will not proceed in an identified Blood Borne Pathogens area.

Universal Precautions Protocol shall be followed at all times by all persons involved in BBP exposure control and cleanup, if they are trained.

If and when an employee is exposed to someone else's blood or OPIM they shall be transported to Citizens medical treatment facility or the closest to the work site for evaluation and treatment to include providing Hepatitis B immunizations at no cost. Appropriate OSHA and worker's compensation reports shall be filed.

15.8.3 Hearing Conservation Program

Noise both ambient and from customer premise equipment and introduced noise hazards need to be identified and controlled in accordance with the health plan for Hearing Conservation.

15.8.4 Respiratory Protection Program

It is recognized that during the course of work it may be necessary to provide the employee with respiratory protection as protection against harmful environments. It shall be the policy of CITIZENS to mitigate and control the levels of toxins and contaminants through elimination, engineering controls including alternative manufacturing materials, enhanced ventilation, or other administrative controls as necessary to avoid the use of respirators. If the use of respiratory equipment is not avoidable, then OSHA Regulation 1910.134 must be followed.

15.8.5 Radiation Exposure Program

Effective pre-job hazard analysis by the facility owner should identify the presence of Radiation and its hazard significance. Specific procedural requirements shall be in place to manage Radiation risk areas and to control exposures to the Radiation. Those requirements are specific to the project and are derived from basic Integrated Safety Management principles – Scope of Work, specific hazard, identified controls, implementation of the control and evaluation of effectiveness of the controls. Plant and Site Managers shall ensure that work will not proceed by any Citizens employee in an identified Radiation area without contracting group meeting the requirements of a safety work environment.

15.8.6 Heat Stress Exposure Prevention Program

Heat Stress is another IH Hazard that cannot be taken lightly. Site supervisors need to identify work completed outdoors or indoor conditions with elevated heat conditions. The southwest region has significant exposures to heat and mitigation and controls need to be planned appropriately. Adequate shade for breaks and drinking water will be made available if the conditions or chance of extended heat exposure exist.

15.8.7 Hazard Control Methods

When necessary in order to control IH-related hazards in the workplace (e.g., gases, vapors, fumes, dusts, and mists; noise; heat stress; non-ionizing radiation), engineering, administrative and/or personal protective equipment controls are employed to keep worker exposures within prescribed limits and to meet requirements of applicable manufacturing specifications.

Implementation of controls follows the hierarchy of first implementing elimination and substitution solutions then engineering controls when feasible and practical, then administrative controls. If these control methods cannot be utilized practically or feasibly, then PPE is prescribed.

15.8.8 Gas Hazard Awareness – Monitoring

When performing work in areas with potential for elevated gas hazards such as confined spaces, excavations, etc., training will be provided which will include gas characteristics, potential health effects, and levels of protection- including PPE, to safely perform the job tasks. All training will be documented and logged within the training record management system.

15.8.9 Monitoring Equipment

Based on site or facility specific requirements stand alone or personal gas detection systems may be utilized by personnel in the field. CITIZENS uses 4 gas monitors, when required for use. Calibration frequency are determined by the manufacturer standards or recommendations. Calibration dates will be easily identifiable on the devices through either digital record or calibration stickers. A designated person shall be responsible for ensuring calibration and tracking. Employees required to use personal gas detection

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devices will be required to ensure either daily calibration or bump tests on the devices to ensure functionality of the device.

15.8.10 General Waste Management

CITIZENS recognizes that service and maintenance wastes, trash, and/or scrap materials will be taken into consideration before work begins.

When directed, CITIZENS will estimate the waste that will be generated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined. Waste materials should be properly handled and stored to minimize the potential for a spill, contamination of product or to impact the environment. Receptacle must be covered to prevent dispersion of waste materials and to control the potential for run-off.

CITIZENS employees will be instructed on the proper disposal method for waste. If wastes generated are classified as hazardous, employees must be trained to ensure proper disposal.

CITIZENS will encourage proper segregation of waste materials to ensure opportunities for reuse or recycling.

15.8.11 Facility Specific Emergency Response Training

Employees are required to adhere to and participate in all required emergency response or contingency planning drills when visiting facilities and work sites. Training shall be documented and logged within the training record management system.

15.8.12 Documentation Requirements

Hazard analysis and controls recommendations completed under this procedure are referred to the Activity Hazards Analysis program element.

15.8.13 Industrial Hygiene References

Fundamentals of Industrial Hygiene, 5th Edition, National Safety Council, ISBN 978-0-87912-216-4, 2001.

29 CFR 1910.1200

16.0 SAFETY PROCEDURES

Workplace safety is a priority for CITIZENS ensuring all employees not only work safely, but have the proper tools, plans and guidance to prevent vulnerability to the employees' health and personal safety. This includes creating PTP's and reviewing JHA to help identify, mitigate and prepare safety procedures for all work conditions.

These procedures provide the necessary steps and guidance to provide safe planning and direction while working in various conditions and with various tools and hazards. The objective is to reduce the chance

of potential incidents and injuries through education, training and planning of work based on known and created hazards. Not all potential safety situations can be foreseen so where issues may arise that are not sufficiently covered under the CITIZENS Safety Procedures, a task specific JHA will be performed and work plans will be created to manage any unforeseen safety issues.

16.1 Responsibilities

Site Supervisor - The Site Supervisor has the responsibility for ensuring the provisions of this section are followed and for ensuring that the necessary employee training and equipment is provided.

PIC- Person in Charge - The PIC has the responsibility for identifying the activities that are covered under this procedure and assure that the necessary tools, information, and equipment are available to employees during the performance of work.

Employees - The employee has the responsibility for adhering to the training provided and following the implementation steps outlined in this procedure.

16.2 Procedures

16.2.1 Personal Protective Equipment

Personal Protective Equipment (PPE) is a last line of defense against injury or harm when the hazards cannot otherwise be controlled through elimination or substitution, engineering controls, or other administrative controls. As many aspects of the manufacturing industry are by nature hazardous, the use of PPE in the workplace is an everyday necessity. Training shall be performed annually at a minimum and whenever a new PPE device is introduced.

16.2.2 Housekeeping

During the course of work activities, efforts will be made to maintain any persons property, government property or facility in as clean a condition as is practical. All debris will be kept clear of work areas, areas of egress, stairwells, and doorways, passageways, and away from adjacent structures. The site foreman will have the responsibility of ensuring the timeliness and completeness of this clean-up effort.

16.2.3 Electrical Safe Work Practices

Electrical Work Practices continue to evolve as the industry recognizes new hazards associated with working with electrical energies including arc flash and arc blast in addition to electrical shock. The design and manufacture of electrical systems continue to evolve as well and it is important to take advantage of new technologies such as Ground Fault Circuit Interruption and Arc Fault Protection.

All electric equipment, systems, machinery and parts thereof are to be considered energized at all times, and treated as such. De-energized circuits shall be tagged as De-

energized. All conductive apparel and jewelry shall be removed before performing electrical work. Nonconductive tools and Electric Work PPE shall be used and worn when performing Energized Electrical work. These requirements are necessary to prevent electric shock.

Working in the vicinity of Overhead Power is very hazardous and shall not be taken lightly.

Energized Electrical Work while avoided within reasonable means is a recognized and accepted risk within the industry related to an ever narrowing list of justifications. Only fully qualified electricians are allowed to perform energized electric work (EEW) in accordance with NFPA 70E, 2015, Electrical Safety in the Workplace. All electric workers shall be trained in NFPA 70E, 2015 before being allowed to perform electrical work and annually thereafter. Training records shall be maintained for 3 years.

16.2.4 Control of Hazardous Energy (COHE) – Lockout/Tagout/Testout (LOTO)

During the performance of work, employees may encounter various sources and types of energy both active and stored. These live and stored energies pose varied and often the most dangerous hazards encountered in the workplace and the manufacturing trades in general. These energies can be electrical, hydraulic, pneumatic, steam, thermal, and kinetic potential stored in springs and other such mechanical potential.

16.2.5 Barricades-Barriers- Signs- Signals

Appropriate hazard identification and barricades to warn personnel of hazards associated with road side work areas, confined spaces, Energized Electrical Work areas, hard hat areas, foot protection areas, high pressure areas, overhead work areas, open excavations, hazardous material storage areas, and flammable hazards.

- Signs, when required shall be visible at all times when work is being performed and shall be removed or covered when the hazard no longer exists.
- Physical barriers or barricades shall be used and installed as stipulated in current Federal, state and local standards and regulations.

While the type of signage and barriers required will vary according to the conditions encountered and the hazards to be identified the following minimum requirements will be met (Reference 29 CFR 1926 Subpart G) and NFPA 70E 2015 Energized Electric Work:

- Flagging and tape barriers (typically for roofs) for temporary use (24hr or less) unless specifically authorized by the site supervisor
- Orange safety fencing for all excavations and trenches
- Appropriate signs for traffic flagging operations
- Barriers shall be checked daily

16.2.6 Hand and Power Tools

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Power hand tools and equipment pose a significant hazard in the workplace for three reasons 1) they are subject to wear and tear proportional to the work and their use 2) they pose a risk of starting unexpectedly during maintenance or attachment/tool changing if not properly disconnected from power sources 3) they are commonly misused due to lack of training or habit.

All hand and power tools will be maintained in a safe condition. Hand held tools shall be used and maintained as specified in 29 CFR 1926.301, Hand Tools. Power tools operated hand tools shall be used and maintained as stipulated in 29 CFR 1926.302, Power Operated Hand Tools.

All hand tools and cord sets shall be used with Ground Fault Circuit Interrupter (GFCI) extension cord accessories or plugged into a GFCI protected circuit. Cords and GFCI equipment shall be inspected on a quarterly basis by a *Competent Person* to ensure continuity and functionality. Documentation shall be similar to 29 CFR 1926 Assured Grounding Standard for construction using either written logs or a color coded visual system. Tools which fail inspection shall be tagged out of service until repaired.

Training specifically for the use of specialized power and hand tools will be provided by Citizens. New employees will be trained in the use of power and specialized hand tools specific to their duties. Employees not trained in the use of specialized tools will not be permitted to use them. Training will focus on the following guidelines:

- Powered tools shall be inspected prior to use to assure that cords, cases, and tools or implements are in working order. Tools with cracked cases, worn or frayed cords, should be removed from use and tagged properly.
- Powered tools shall be disconnected from their power source prior to changing blades, bits, or tooling.
- Tools shall be double insulated or provided with an equipment ground. The equipment ground should be inspected prior to use.
- Do not raise, lower, or otherwise transport power tools by holding the cord.
- Tools will be used in accordance with the manufacturer's recommendations.
- The appropriate tool will be selected for the task.
- **All power tools shall be used with guards provided with the manufacturers recommended guard in accordance with manufacturer's recommendations.**

Training records shall be retained for a period of 3 years.

The use of powder-actuated tools shall be kept to a minimum. Only employees trained in the use of such tools will be authorized for its operation. The use of powder-actuated tools will be in accordance with 29 CFR 1926.302, paragraph (e). Authorization to use powder-actuated tools may be given only after completion of training and demonstration of competency.

Personal protective equipment will be used with each tool in accordance with the manufacturer's recommendation or as stipulated by company policy.

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All equipment requiring maintenance or repair should be brought to the attention of the project foreman. The equipment shall be immediately taken out of service if it cannot be repaired in accordance with the manufacturer's recommendation.

A repair tag shall be affixed to the equipment in a visible location. The equipment will be placed in allocation where there is no possibility of incidental use. Equipment and cord sets shall be inspected by a *Competent Person* designated by the safety/HR manager.

Arrangements should be made by the project foreman to have the equipment removed or discarded.

16.2.7 Ladder Use

Ladders will be used in accordance with 29 CFR § 1926.1053, by all employees and subcontractors on all work sites. Only electrically non-conductive ladders may be purchased and used for any task which has the potential for electrical equipment or parts contact. The site supervisor will be responsible for the following activities:

- Ladders with bent or corroded rails, broken or missing rungs, or otherwise unsuited for the purpose will immediately be removed from service.
- Ladder rungs will be uniformly spaced in accordance with OSHA 1926.1053 and/or ANSI 14.2 standards/specifications.
- Ladders will be used in compliance with defined manufactures recommended load capacities for the required tasks
- Ladders will be visually inspected periodically – if during inspection or at any time the ladder is deemed defective it will be tagged "Do Not Use" and removed from service.
- Ladders will only be used for the intended purpose and in accordance with the manufacturers recommended guidelines
- Extension ladders will be tied, blocked, or secured to prevent incidental displacement and shall extend a minimum of 3 feet above the upper landing surface.
- Ladders shall be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (4:1 Ratio).
- When working from ladders employees will be tied off to a firm structural support. Tying off to piping, conduit, or other utility system is not permitted.
- Metal ladders will not be used where the possibility of contact with an electrical source. Ladders shall have non-conductive side rails.
- Safe practices include but are not limited to: not standing on the top two rungs of a step ladder, facing the ladder when ascending or descending, and not carry objects that could cause injury in the event of a fall.
- Other safe practices: not using A-frame ladders leaning against walls or surfaces, and following all manufactures recommendations.

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16.2.8 Scaffolding

Scaffolding will be used in accordance with 29 CFR § 1926.451 all employees and subcontractors on the facilities. The manufacturing foreman will be responsible for the following activities:

- All scaffold systems shall be managed by a trained competent person designated by CITIZENS Coop.
- Scaffolds will be erected in accordance with 29 CFR § 1926.451, Scaffolds
- Guardrails and toe boards will be installed on all open sides for scaffolds over ten feet in height
- All scaffolding erected will have, as a minimum, guardrails on all open sides. Additional guardrails will be installed per the above referenced section
- Scaffolds with damaged or corroded rails, pins, braces, trusses, ladders, or legs will immediately be tagged out of service until a competent person has repaired or replaces the discrepancy identified.
- Daily inspection tagging systems which include a date and signature line for the competent person will be color coded green indicating "ready for use" and/or a red tag indicating "do not use".
- Planking used on scaffolds will conform to 29 CFR § 1926.451, paragraph 10
- All planks installed will be overlapped a minimum of twelve inches or secured from movement
- Planks will extend a minimum of six inches beyond the end support but no more than twelve inches
- Ladders will be provided for access to all scaffolds
- Employees will be provided scaffold training with training to include OSHA 29 CFR § 1926.451 sections (f) use of scaffold, (g) fall protection, and (h) falling object protection.

Any deficiencies in the demonstrated awareness of these requirements as identified by a competent individual will prompt retraining. All training will be documented and logged.

16.2.9 Fall Protection

Most of our contractual work will involve working on elevated surfaces and above excavations, machinery, and pits where fall protection is required. As a general rule, fall protection will be provided for work on all surfaces where the differential between the work surface and the lower elevation is 6 feet or greater. Employees will be provided initial training and re-training when either there are 1) deficiencies in training or, 2) the work place changes or, 3) fall protection systems or equipment changes that warrant additional training.

Working surfaces, platforms, ramps, and wall and stairway openings shall be protected as stipulated in the above referenced Subpart M. Specifically the site supervisor or contracting agent shall have the responsibility for ensuring that all openings and elevated surfaces are guarded by railings, toe boards, or covers per 29 CFR 1926.501, Duty to Have Fall Protection.

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Stairways shall meet the requirements of 29 CFR 1926.1052 for railings. Tripping hazards shall be removed as well as all hazardous projections such as nails. Lighting of stairs will be accomplished in accordance with 29 CFR 1926.56(a), Illumination.

Fall protection will be required as stated above however, the specific fall protection system may vary as conditions warrant. As a general guideline, fall protection will be provided through guardrails and personal fall protection systems (i.e. lanyards and full body harnesses). Prior to the start of each project the fall protection requirements will be reviewed by the site supervisor and /or competent person. The proper PPE or fall protection system will be provided by Citizens Coop. Any facility specific fall protection plans will be developed by a qualified person.

If an issue arises that requires, prompt rescue will be deployed either through 911, the facility specific emergency number, and/or by CITIZENS team member plan developed in the specific fall protection plan (i.e. ladder, ALEWP, etc.)

When guardrails are used they shall meet the following requirements:

Minimum Specifications for Guardrail Systems

Type of Material	Size of Top/Mid Rail [in]	Height [in] Top Rail ⁽¹⁾	Post Size/Spacing ⁽²⁾	Strength ⁽³⁾ [lbs]
Wood	2x4 / 1x6	42	2"x4" / 8 ft.	200
Pipe	1-1/2 nominal OD	42	1-1/2" nom / 8 ft.	200
Steel	2"x2"x 3/8" angle	42	2"x2"x 3/8" angle / 8 ft.	200 or equivalent bend strength
Wire Rope	3/8 ⁽⁴⁾	42	equivalent to one of the above	200
Other Equivalent	equivalent to one of the above	42	equivalent to one of the above	200

(1) Acceptable heights range from 39" to 45" (42" +/- 3"). Mid rail should be 1/2 height of top rail.

(2) Spacing is horizontal distance measured center post to center post

(3) Railing must have a minimum deflection in any direction 200 lb force is applied. Minimum deflection is 3" for wire rope after 200 lb force is applied should be used as a guideline. Strength is applicable to all elements of system including anchor points.

(4) There is no OSHA National Office guidance for size of wire rope guardrails (3/8" is a recommended size). A 1/2" rope equivalent is required for periphery of floors during steel erection

16.2.10 Personal Fall Protection Systems

All employees using Personal Fall Protection systems will be trained to properly don and use the system. When used, harnesses shall be full body type with lanyards capable of supporting the anticipated load per 29 CFR 1926.502(d).

- Lanyards shall be anchored to structural members only. Never anchor a lanyard to a utility line.
- In the event a harness and lanyard are used to abate a fall, the system shall be removed from service.
- Inspect the webbing and support structure prior to each use and after a fall. Any signs of fatigue, wear, or damage should be reported to the project foreman for replacement.
- Store the fall protection system such as to avoid damage due to heat, sunlight, moisture, chemicals, or other deteriorating element.
- Fall protection equipment will meet the requirements of the applicable ANSI, ASTM or OSHA requirements and standards.

Training – CITIZENS will provide fall protection training for each employee who might be exposed to fall hazards. Employees should be able to recognize the hazards of falling and procedures to follow to minimize these hazards. Employees will be required to re-train on fall protection if 1) there are deficiencies in training, 2) there are work place changes, or 3) the fall protection systems or equipment changes that render the previous training obsolete. The written qualification record shall contain the name or other identity of the employee trained, the date(s) of the training, and the signature of the person who conducted the training or the signature of the employer. All training will be documented and logged within the record management system (Viewpoint)

Control - When necessary, controlled access zones will be utilized and the access zones will be defined by the qualified representative of CITIZENS. Safety monitoring systems should not be used as a means of fall protection unless necessitated by work restrictions or in ability to utilize fall protection systems as defined by manufactures instructions. If the need for a safety monitoring system arises, the plan will be defined and reviewed utilizing a job hazard analysis and approved by CITIZENS before work is to ensue.

CITIZENS' safety representative will identify the competent person (monitor). The monitor should be capable of and assigned to:

- 1) recognize fall hazards,
- 2) warn employees if they are unaware of a fall hazard or are acting in an unsafe manner
- 3) be on the same working surface and in visual sight
- 4) stay close enough for verbal communication

5) not have other assignments that would take the monitors attention away from the monitoring function.

Fall Investigation - In the event of a fall or some other serious incident occurs, CITIZENS will investigate the circumstances of the fall or other incident to determine if the fall protection needs to be updates or changed and shall implement the changes to prevent similar types of events from happening in the future.

16.3 Confined Space Procedure

Many workplaces contain spaces that are considered to be "confined" because their configurations hinder the activities of any employees who must enter into, work in, and exit from them. In many instances, employees who work in confined spaces also face increased risk of exposure to serious physical injury from hazards such as entrapment, engulfment, and hazardous atmospheric conditions. CITIZENS recognizes the need for employees to occasionally make entry and shall provide proper PPE and equipment to do so.

16.4 Fire Protection

It is the general belief that fires on a project site that damage and injuries as a result of those fires are a direct result of poor housekeeping, inadequate planning, lack of or inadequate suppression equipment, and improper training. It is the intent of the management of CITIZENS to mitigate the effects of fire through prevention and proper training and to manage workplace fire emergencies by providing the necessary equipment.

16.5 Hot Work – Open Ignition Source

Any and all hot work will be managed under the pretense of the Fire Prevention plan. It is the intent of the management of CITIZENS to mitigate the effects of Hot Work through prevention and proper training and to manage workplace fire emergencies by providing the necessary equipment, planning and training.

16.6 Powered Industrial Trucks - Forklifts and Pallet Jacks

The use of any heavy equipment in the workplace requires that employees be trained with formal instruction, practical hands on training with an evaluation in the workplace on safely operate the machinery. To include load capacity, refueling, ramps counterbalances and safe operating instruction. Each year hundreds of incidents are caused by someone using heavy equipment they were not qualified to operate. A forklift falls into the heavy equipment category and requires a certification to operate. Any time an operator is found to be operating equipment unsafely, causes an incident or is operating a different vehicle type, the employee must take refresher training specific to the needs. Any forklift and/or heavy equipment operations must comply with the following:

- Only qualified instructors may provide training to employees
- Only authorized persons shall operate machinery or equipment.

- When delivered the equipment owner will verify that the trailer is chocked and all supports and dock plates are used and in safe working order prior to loading/unloading equipment.
- Operators will be re-evaluated every 3 years or when conditions warrant.
- Operators will conduct daily inspections of the equipment prior to use and at each shift change.
- Loose or frayed clothing, or long hair, dangling ties, finger rings, etc., shall not be worn around moving machinery or other sources of entanglement.
- Machinery shall not be serviced, repaired or adjusted while in operation, nor shall oiling of moving parts be attempted, except on equipment that is designed or fitted with safeguards to protect the person performing the work.
- Appropriate, lock-out procedures shall be used when working on machinery and equipment.
- Employees shall not work under vehicles supported by bumper jacks or chain hoists, without protective blocking that will prevent injury if jacks or hoists should fail.
- Air hoses shall not be disconnected at compressors until air pressure has been bled off.
- All training will be documented and logged within the training record management system.

16.7 Aerial Lift/ Elevated Work Platform/Bucket Trucks

There are different types of aerial work platforms, such as elevating work platforms, scaffolds, scissor lifts, hotel lifts and cherry pickers. They provide temporary work surfaces and access at heights, are designed to be moved and used where needed and are used to lift and hold limited weight. They can be un-powered, self-propelled or vehicle-mounted. Special precautions and procedures are necessary for safe assembly and use of aerial work platforms. No Citizens employee shall operate any type of lift or bucket truck without proper training,

16.8 Cranes

Cranes, when required for the performance of work, shall comply with the above referenced section. CITIZENS shall utilize a qualified subcontractor when a crane or derrick is required for work. CITIZENS shall notify the owner's representative a minimum of forty-eight hours in advance to arrange for an inspection as required. Crane inspection reports and certification with load test data will be requested as a submittal to CITIZENS from the crane operator prior to arrival. This information will be made available to the owner's representative upon request. The owner's representative/Operator will adhere to the Manufacturer's instructions for assembling and/or disassembling and operational functions of the equipment. Only Qualified competent persons must direct the assembly/disassembly and inspection of the equipment. The operator must provide documentation he/she is qualified before operation of the crane.

The submittal shall contain as a minimum:

- annual load test certificates
- Qualified operator's experience and training certificates/licenses
- records of daily/monthly inspections of equipment and safety devices

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- records of modifications and repairs

During the use of any cranes or derricks the following precautions will take place:

- Before operation, a pre operation hazard assessment of the work zone will be performed to check for proximity of overhead power lines- to address and correct the potential of the equipment reaching closer than the 20' allowable distance. When possible, a request to de-energize the lines will be made
- The facility will be inspected for ground conditions to assure the equipment can be supported along with any supporting materials per the manufacturer's specifications
- All safety devices must be in proper working order before operation begins.
- A spotter will be used to guide the crane operator when working under or near any overhead power lines
- The swing area of the crane will be guarded by flags, barriers, or a person whose sole responsibility is to ensure that no persons enter the identified area, or no employee be allowed under the load whenever the crane is in operation
- A tag line shall be used at all times and only qualified individuals will operate the tag line.
- All rigging equipment when not in use shall be stored out of the work area.
- Cranes, Derricks, Slings and rigging will be checked on a daily basis by the manufacturing foreman and the designated competent subcontractor responsible for the operation. All slings with an unknown load rating, frayed or worn slings, broken wires within the rope, or worn shackles will be removed from service. No rigging equipment shall be overloaded in excess of its permitted load rating. All hooks and latches will be inspected prior to use.
- All hooks will have latches in place and in proper operating condition.
- All safety devices must be inspected and in proper working order before operation begins
- All safety devices including rigging equipment for material handling will be inspected as necessary during its use to ensure it is in safe working condition.
- All manufactures operating procedures and daily inspection logs will be maintained in the cab at all times
- No Christmas treeing of loads will be permitted
- The operator or any other employees has the authority to stop and refuse to handle any load whenever there is a safety concern
- The Owner must provide a signal person for the operator at all times, if the view for the operator is obstructed satisfactory means of communication for the operator and signal person must be met and approved
- No modifications or additions that may affect the capacity or safe operations of the equipment will be made without written approval from the manufacture or registered professional engineer.
- During any movement from one location to another the crane operator along with spotter shall assure a path adequate for a safe relocation process.

16.9 Illumination and Lighting

Work and storage areas shall be kept illuminated at levels no lower than those specified in 29 CFR 1926.56, Table D3, Minimum Illumination Intensities in Foot-candles. Where temporary lighting is required to meet those levels, the installation shall be in accordance with 29 CFR 1926 Subpart K, Electrical and the appropriate articles in the National Electric Code and additionally the Electrical Work Practices procedure. (29 CFR 1926.26)